

Philadelphia Infant Toddler Early Intervention

Service Start Date Policy

Early Intervention Regulations stipulate that all services on the Individualized Family Service Plan (IFSP) must start within 14 calendar days of the plan development date. This includes annuals, initials and addendums. In order to maintain compliance with this regulation, all Philadelphia Infant Toddler Early Intervention providers must implement the following strategies.

- A. A telephone/electronic start date reporting system to replace paper/contact note in-person submissions by staff and contractors.
- B. Employment and Orientation materials must reflect that staff are ***expected*** to adapt a more flexible work schedule and be prepared to 'start' services on a Sunday, Saturday, Holidays, and evenings in order to start services within 14 days of the IFSP development' date.
- C. Upon receipt of the agency's monthly start date report, review and analyze the data to determine if there are any patterns of delayed starts that can be addressed. For example: Same staff person or discipline consistently starting services late. Provider must immediately share findings with their assigned County Program Analyst and implement corrective steps until issue is resolved

Start Date Guidelines

1. When accepting a referral, a provider must first note the number of days remaining in the 14 day (from IFSP development) start date time frame.
2. Because time is needed to develop the IFSP in PELICAN and place the services on the Master Referral list (MRL), providers should anticipate and are expected to begin all services in less than **10 calendar days** from the plan development date.
3. Service coordinators are expected to post new services to the MRL in 1 calendar day from plan development date.
4. Providers are to triage service starts based on the number of days that remain from IFSP development time frame so those services with fewer days are assigned first in order to have a timely Service Start.
5. **Any service that can begin within 14 days of IFSP development should begin in that time frame, using any strategy necessary to meet service start date compliance.**
6. Services that are picked up from the MRL and are already over the 14 day time frame must be started within 7 calendar days.
7. Providers are **required** to make all preparations so that they can implement the following strategies for starting services on time:
 - Identify staff who can be available 7 days per/week, holidays and until 9:00 PM to accomplish "**brief first visits**' (***See note #1***). This can be done by allowing current staff to do additional 'shifts' or replacing staff that leave the agency with staff who have flexible schedules.

- Provider referral unit staff schedule the first appointment to occur within the 14 day period (on behalf of the assigned service provider) as soon as the agency is authorized for the service.
 - Vacation and leave schedule for service providers must be made available to the provider referral unit staff so new services are not assigned to staff who are on vacation unless a brief first visit will be used in order to assure start date compliance
 - If attempts to arrange a Transdisciplinary IFSP consultative first visit cannot be accomplished within the 14 day compliance time line, the provider agency for the TD consultant should contact their Program Analysts. Permission may be granted on a case by case basis for the consultant to make a brief first visit in order to maintain compliance. In those instances the brief first visit should not last more than 15 minutes (since the Primary Service Provider-PSP will not be present) in order to preserve the intent and purpose of the consultation. The purpose of that brief first visit by the consultant is to:
 - Introduce yourself as the consultant that the PSP and family requested.
 - Give contact information to the family
 - Begin to assess the questions/service needs that the PSP and family have
 - Schedule or confirm the date/time of the next visit.
8. Providers should be aware of and remind their staff that **Start dates (even brief starts) are services** and should be reported and documented in contact notes as such.
 9. **Every family** must be offered a first visit within 14 days of the IFSP development date. Providers can explain to families the regulatory requirement for this time frame. If the date is not acceptable to the family the delay can be attributed to 'family reasons'. See below for suggested language that can be used to have this discussion with families. **(See note #2)**
 10. Careful consideration should be given when identifying the designated reason for delay, using '**Delay Reasons**' written guidance developed by the County. (* See note#3)
 11. All early intervention staff should be trained to properly assign the delay reasons and to understand that **delay reasons are not an effort to assign blame or fault** for a service delay. The intent is only to categorize for OCDEL and OSEP reasons why services, may not start within the 14 day time line established in the regulations.

II County Targets

A. Service Start Targets: All services (100%) must start within 14 calendar days of the IFSP development date.

1. All providers must assure and be prepared to start **all services (100%)** that they are authorized for in less than 7 calendar days from authorization date
2. Service coordinators are expected to post all new services (100%) to the MRL in 1 calendar day from plan development date.

B. Reporting Start Dates Target: A start date is the first face-to-face visit with the family by an early intervention service provider after IFSP development/addendum.

1. Providers are required to report **all service start dates (100%)** in the PEIRS data system so that the data can be placed in PELICAN and the County and Providers can continue to

receive start date reports for monitoring. Start dates **must be reported within 5 working days of the service start date.**

****Providers who have outstanding start dates may be prohibited from picking up new service referrals until it can be confirmed that all of their start dates have been reported***

NOTES:

1. * Brief First Visits are short initial EI sessions, usually lasting 15-30 minutes, that are made by an available provider of the same discipline, from the same agency. A brief first visit may also be made by the assigned service provider who may not have cleared their schedule to see the family for the full length of time outlined on the IFSP, but can arrange a time for an introductory visit. If the visit is made by someone from the same discipline who will **not** be the assigned service provider the focus of the brief visit will be to:

- Share information about the agency
- Give contact information to the family for the assigned service providers
- Ascertain and begin to address immediate concerns questions that the family has
- Assure the family that the assigned staff person will be in contact with them within 5 calendar days
- Schedule or confirm the date/time of the next visit.

2. “Language for scheduling initial visits with families: “Early intervention regulations indicate that all services must begin within 14 days of the IFSP development date. In your case, that would mean a visit would have to occur before ____ (date/day of the week that is the 14th day from the IFSP plan development date). In order to be in compliance, we want to offer you a visit for ____ (date within the 14 day period). I understand if this date is not best for you as you may have something else planned and it may be short notice. We can schedule the visit at a time that is more convenient, but I am required to offer a visit to you within the 14 day timeframe that I mentioned earlier.”

3. Delay Reasons:

System Reason for Delay

- No provider available to pick up referral for service. Child on waiting list for 14 days.

Provider/System Delay Reasons

- Service provider assigned by agency can/does not start service as scheduled.
- Provider misses or cancels appointment for any provider related reason* and the appointment cannot be rescheduled within the 14 day time frame.

*provider related reasons: car broke down, illness, personal emergency, another appointment

Family Reason for Delay

- Family chooses to wait for a particular provider agency or service provider (or service provider type: male or female) after being offered a provider who could start within the 14 day time frame.
- When provider attempts to arrange appointment (with 2 days’ notice), the family cannot schedule within the 14 day start date period.
- Family calls to cancel for any reason (vacation, illness, other appointment, etc.)
- Family reschedules visit (for any reason) outside of the 14 day period.
- Family not available at time of scheduled visit (e.g., no answer on telephone or at the door).
- Child is not available (for any reason) at time of scheduled visit. For example: child not a day care, child is in hospital, child is ill.



Acts of Nature

- Weather related emergencies such as icy roads, snow or ice storm, flooding, torrential rains, active hurricane or tornado and/or hurricane/tornado watch.
- Safety related emergencies such as fires, terror attack or alert, active crime scene, etc.
- Inaccessibility reasons such as area around the home cordoned off for any police or fire activity or snow piles or flooding after unusual amounts of precipitation which causes and inability to park, walk or access the family using public transportation.